

BellSouth Telecommunications, Inc.

Legal Department

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Patrick W. Turner

General Counsel-South Carolina

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January 23, 2004

The Honorable Bruce Duke
Executive Director
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Proceeding to Establish Guidelines for an Intrastate Universal Service Fund
Docket No. 97-239-C

Dear Mr. Duke:

Enclosed for filing are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response to the South Carolina Cable Television Association's First Set of Interrogatories and Requests to Produce in the above-captioned matter.

By copy of this letter, I am serving all parties of record with a copy of this document as indicated on the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink that reads "Patrick W. Turner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Patrick W. Turner

PWT/jbm

Enclosures

cc: All Parties of Record

PC Docs # 523508

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 97-239-C

IN RE:

Proceeding to Establish Guidelines for an)
Intrastate Universal Service Fund)
_____)

**BELLSOUTH TELECOMMUNICATION, INC.'S RESPONSE TO THE SOUTH
CAROLINA CABLE TELEVISION ASSOCIATION'S FIRST SET OF
INTERROGATORIES AND REQUESTS TO PRODUCE**

BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits the following Response to the First Set of Interrogatories and Requests to Produce that the South Carolina Cable Television Association (SCCTA) served on BellSouth on or about January 13, 2004.

GENERAL OBJECTIONS

1. BellSouth objects to each Interrogatory and Request for Production to the extent it seeks to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this proceeding on the grounds that such interrogatories and requests for production are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. BellSouth will not be responding to discovery that seeks information from parent and affiliate companies.

2. BellSouth objects to the each Interrogatory and Request for Production to the extent it is intended to apply to matters other than those subject to the jurisdiction of the Public Service Commission of South Carolina ("the Commission"). BellSouth objects to such Interrogatories as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each Interrogatory and Request for Production to the extent that it calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. BellSouth objects to each Interrogatory and Request for Production to the extent that it seeks to impose obligations on BellSouth that exceed the requirements of the South Carolina Rules of Civil Procedure, the Commission's rules and regulations, or other South Carolina law.

5. BellSouth is a large corporation with employees located in many different locations in South Carolina and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the requests purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

6. BellSouth objects to each Interrogatory and Request for Production that seeks to obtain "all" of particular documents, items, or information to the extent that such requests are overly broad and unduly burdensome. Any answers provided by BellSouth in response to this discovery will be provided subject to, and without waiver of, the foregoing objection.

SPECIFIC RESPONSES

Without waiving any of the foregoing general objections, BellSouth responds to DeltaCom's Interrogatories and Requests for Production as follows:

BellSouth Telecommunications, Inc.
SCPSC Docket No. 97-239-C
South Carolina Cable Television Association's
First Set of Interrogatories
January 13, 2004
Item No. 1
Page of 1 of 1

REQUEST: For each service for which you have reduced a rate and received USF funding since inception of the South Carolina USF, state the following:

- a. the minutes of use of such service for each year since 1997; and,
- b. the revenues received from the sale of such service for each year since

RESPONSE: BellSouth objects to this Interrogatory on the grounds that it is vague, it seeks information that is not relevant to the subject matter of this proceeding, and the information sought does not appear reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, BellSouth has reduced originating and terminating intrastate carrier common line charges in association with its withdrawal of funds from the intrastate universal service fund ("State USF"). The minutes of use and revenues from interexchange carriers ("IXCs") associated with these charges since 1997 are set forth in Attachment A to this response. The minutes of use and revenues from independent companies ("ICOs") associated with these charges since 1997 are set forth in Attachment B to this response.

BellSouth also has reduced its rates for pay telephone access lines ("PTAS") in compliance with the Commission's directive in Order No. 2001-419 regarding Lifeline. BellSouth does not charge for PTAS service on a minutes of use basis, but the revenues from PTAS services since 1997 are set forth in Attachment C of this response.

RESPONSE PROVIDED BY: Ed Matejick (Attachment A)	Rufus Moore - Manager
Manager	(Attachment C)
34S91	Rm. 17M61
675 W Peachtree St NW	675 W Peachtree St NW
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Vanessa Gill (Attachment B)	
Senior Financial Analyst	
1600 Williams St	
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523444

South Carolina
Intrastate Carrier Common Line ("CCL") for Interexchange Carriers ("IXCs")
1997-2003

	1997	1998	1999	2000	2001	2002	2003 ¹
Orig. CCL							
MOUs	603,036,752	639,625,393	656,418,105	662,774,389	586,814,518	511,926,110	499,590,886
Revenues ²	-	-	\$ 5,586,439	\$ 4,518,790	\$ 3,306,081	\$ -	\$ -
Term. CCL							
MOUs	728,404,786	726,763,157	779,523,518	877,536,318	970,837,666	1,015,008,758	882,960,853
Revenues ²	-	-	\$ 20,571,639	\$ 23,097,200	\$ 18,843,344	\$ 141	\$ -
Total CCL Revenue	\$ 24,563,606	\$ 25,329,691	\$ 26,158,078	\$ 27,615,990	\$ 22,149,425	\$ 141	\$ -

¹2003 is 11 months through November data.

²CCL Revenue data for 1997 and 1998 is available as total only.

**South Carolina
 Intrastate Carrier Common Line ("CCL") for Independent Companies ("ICOs")
 1997-2003**

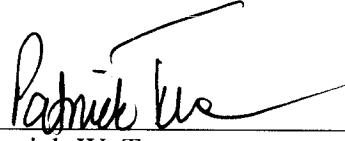
	1997	1998	1999	2000	2001	2002	2003
Originating CCL							
MOUS	369,803	250,912	209,701	221,392	194,374	141,817	108,305
Revenue	\$3,698	\$2,509	\$1,430	\$1,261	\$1,104	\$0	\$0
Terminating CCL							
MOUS	36,610,471	24,840,277	20,760,402	21,917,806	19,243,043	14,039,925	10,722,151
Revenue	\$966,150	\$655,535	\$547,867	\$483,294	\$430,703	\$0	\$0
Total CCL Revenue	\$969,848	\$658,044	\$549,297	\$484,555	\$431,807	\$0	\$0

BellSouth Telecommunications, Inc.
SCPSC Docket No. 97-239-C
South Carolina Cable Television Association's
First Set of Interrogatories
January 13, 2003
Item No. 1
Attachment C
Page of 1 of 1

South Carolina
Pay Telephone Access Service ("PTAS") Recurring Revenues

Year	Revenue
1997	1,187,387
1998	2,285,517
1999	1,454,039
2000	4,298,865
2001	4,462,303
2002	2,887,419
2003	2,082,089

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Patrick W. Turner", is written over a horizontal line.

Patrick W. Turner
1600 Williams Street, Suite 5200
Columbia, South Carolina 29201

ATTORNEY FOR BELL SOUTH
TELECOMMUNICATIONS, INC.

523444

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 97-239-C

IN RE: Proceeding to Establish Guidelines)	
for an Intrastate Universal Service Fund)	CERTIFICATE OF SERVICE
_____)	

This is to certify that the undersigned, Jeanette B. Mattison, is employed by the Legal Department for BellSouth Telecommunications, Inc. and that she has caused BellSouth Telecommunications, Inc.'s Response to the South Carolina Cable Television Association's First Set of Interrogatories and Requests to Produce in the foregoing matter to be served upon the persons named below this 23rd day of January, 2004, by placing copies of same in the United States Mail, postage prepaid, addressed as follows:

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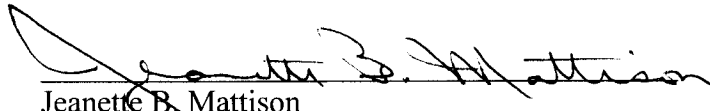
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